From: POULSEN Mike
To: Eric Blischke/R10/USEPA/US@EPA
Cc: Chip Humphrey/R10/USEPA/US@EPA; Dana Davoli/R10/USEPA/US@EPA
Subject: RE: Naphthalene
Date: 07/14/2009 05:03 PM

Eric -

I'll let EPA worry about how to apply MCLs. I would rather stick with risk-based values, such as the regional screening levels. I would not assume that all the PAHs are as toxic as BaP, when we already have TEFs quantifying relative toxicity. We apply those regularly in risk assessments. My point was that if you are going to apply the lowest value in the JSCS table, you are already using 0.2 ug/L for naphthalene.

You are right, the screening level for naphthalene is based on an IUR of 3.4E-5 (ug/m3)-1. We don't use inhalation slope factors any more. EPA has not developed their own IUR value, and instead is now using the value developed by CalEPA. The reduction in screening level comes from switching from a non-cancer evaluation to a cancer evaluation, which typically results in a substantial reduction in screening levels.

If we exceed the naphthalene screening level in water samples, then I guess we'll have a risk by the drinking water pathway. Some interesting issues to discuss.

- Mike

-----Original Message-----
From: Blischke.Eric@epamail.epa.gov
[mailto:Blischke.Eric@epamail.epa.gov]
Sent: Tuesday, July 14, 2009 4:25 PM
To: POULSEN Mike
Cc: Humphrey.Chip@epamail.epa.gov; Davoli.Dana@epamail.epa.gov
Subject: RE: Naphthalene

Ok - this raises a series of questions/comments for me:

1) There is no MCL for naphthalene. The only MCL for PAHs is an MCL of 0.2 ug/l for Benzo(a)pyrene.
2) The screening level for naphthalene went from 6.2 ug/l to 0.14 ug/l - an approximately 50-fold reduction. However the basis for this change is not clear to me. How can it be due to the class C carcinogen classification when a slope factor has not been developed for naphthalene? It sounds like the new screening level is based on the IUR of 3.4 E-5 as presented in the Region 6 PRG table. Is this correct?
3) It should be noted that all but one TZW sample exceeds 0.14 ug/l and that we have at least one (and likely more) surface water detections above this level.

Eric

"POULSEN Mike" <POULSEN.Mike@deq.state.or.us> 07/14/2009 03:41 PM
To: Eric Blischke/R10/USEPA/US@EPA
cc: Chip Humphrey/R10/USEPA/US@EPA, Dana Davoli/R10/USEPA/US@EPA
Subject: RE: Naphthalene

Eric -

Dana told the LWG last fall to use the new EPA regional screening levels, which included naphthalene as a carcinogen (for inhalation). The regions got their tox information from CalEPA, since EPA has not updated IRIS. So we should be covered for the HHRA.

For source control, the tap water "PRG" level goes down to 0.14 ug/L. But the MCL of 0.2 ug/L has not changed, so there is not a big difference.

We can discuss this at the TCT if you want.

- Mike

-----Original Message-----
From: Blischke.Eric@epamail.epa.gov
[mailto:Blischke.Eric@epamail.epa.gov]
Sent: Tuesday, July 14, 2009 12:19 PM
To: Davoli.Dana@epamail.epa.gov; POULSEN Mike
Cc: Humphrey.Chip@epamail.epa.gov
Subject: Naphthalene

During the M&B annual meeting last week, the issue of naphthalene being classified as a carcinogen (Class C according to IRIS) came up. However, when consulting IRIS, an oral slope factor was not derived due

to the "lack of chronic oral naphthalene studies" and an inhalation slope factor was not derived due to the "weakness of the evidence."

My question is whether we are evaluating naphthalene as a carcinogen in the HHRA and what are the implications for source control and other evaluations (e.g., development of performance standards for cap construction)?

Any thoughts?

Thanks, Eric